

(EXHIBIT A)

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1 those accounts. But, absent that, the privacy interest of the
2 employees prevails. That is the position that we have taken on
3 these issues.

4 THE COURT: So, what is your basis for believing that
5 there would be any business-related traffic on Mr. Sharp's
6 personal e-mail account?

7 MR. SNYDER: It could be personal e-mail account, it
8 could be his Sharp Things consulting firm e-mail account. I
9 think it's very likely there's going to be relevant documents,
10 because one of the claims in the defamation claim is that we
11 called Mr. Adam Sharp a partisan political operative. If that
12 were an accurate description of Adam Sharp, that would be
13 likely to show up in maybe not in any award e-mail, but perhaps
14 his consulting e-mail.

15 THE COURT: I'm sorry. We have gone off the rails.
16 You said you wanted them to search three terms?

17 MR. SNYDER: Yes.

18 THE COURT: Goodman?

19 MR. SNYDER: Yes.

20 THE COURT: A YouTube clip.

21 And I can't remember what the third one was.

22 MR. EICHNER: Your Honor, it was an e-mail
23 workingactre [REDACTED] That is the e-mail address of the
24 person who notified the television academies of the image.

25 THE COURT: How are these three search terms going to